



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

March 8, 2019

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Nat'l Immigration Project et al. v. U.S. Dep't of Homeland Security et al.*,
No. 18 Civ. 659 (RA)

Dear Judge Abrams:

Pursuant to the Court's order of February 8, 2019 [ECF No. 84], we write respectfully on behalf of the parties in the above-referenced Freedom of Information Act case to present a status report regarding our progress on determining which of the documents remaining at issue in the pending summary judgment motions have been made public through other lawsuits relating to the decision to terminate Temporary Protected Status for Haiti. The parties have made a good deal of progress on this document comparison project, but have not yet been able to complete it due to technological difficulties. We expect to be able to complete it in the next few weeks. We thus propose providing the Court with a further status report in three weeks, on March 29, 2019, indicating which of the documents at issue in the summary judgment motions have been made public (and therefore are no longer at issue in this case), and stating whether the parties require the Court to resolve their motions for any remaining documents

We thank the Court for its consideration of this request.

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

By: s/Jean-David Barnea
JEAN-DAVID BARNEA
Assistant United States Attorney
Tel. (212) 637-2679
Fax (212) 637-2686

s/Nancy Morawetz

Nancy Morawetz
Jessica Rofé
Fatima Carrillo, Legal Intern
Nora Searle, Legal Intern
Kevin Siegel, Legal Intern
WASHINGTON SQUARE LEGAL
SERVICES, INC.
Immigrant Rights Clinic
245 Sullivan Street, 5th Floor
New York, NY 10012
nancy.morawetz@nyu.edu
jessica.rofe@nyu.edu

Sejal Zota
NATIONAL IMMIGRATION PROJECT
OF THE NATIONAL LAWYERS GUILD
14 Beacon Street, Suite 602
Boston, MA 02108
(617) 227-9727
sejal@nipnlg.org

Attorneys for Plaintiffs